

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

Rooterman, LLC	)	
	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	Civil Action No. 1:24-cv-13015
	)	
Klodian Belegu, Quality Air Care	)	
Corporation, RM Water Damage	)	
Restoration LTD and 911 Sewer & Drain	)	
Corporation.	)	
	)	
<i>Defendants.</i>	)	
	)	

**REPLY DECLARATION OF NATHAN KING**

Pursuant to 28 U.S.C. § 1746, I, Nathan King, declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

1. I am the General Counsel of Plaintiff. I submit this declaration in support of Plaintiff's Reply Memorandum in Further Support of Its Motion for Preliminary Injunction.
2. Rooterman, LLC has taken numerous efforts to enforce its trademarks around the country. In the recent years, Rooterman has filed two other lawsuits against former franchisees who continued to hold themselves out as a Rooterman franchisee and infringed on the Plaintiff's name and marks. This includes A Corp. DBA Rooterman v. Palmetto Group Investment, docket no. 1:20-cv-11901-MLW (D. Mass. 2020) and A Corp. v. America's Plumbing & Sewer, LLC, docket no. 1:22-cv-10915-IT (D. Mass. 2022) Rooterman's outside counsel even wrote to Belegu and explained some of its efforts to enforce its trademarks to Belegu in a letter dated March 20, 2023, attached hereto as **Exhibit A** (referencing cease and desists and other efforts to enforce

trademarks in 2020, 2021 and 2022). In the last year alone, I too have sent at least six cease and desist letters to person and/or former franchisees in New Jersey, California and Ohio who are believed to be infringing on Rooterman's marks, and we continue to work on satisfactory actions by the recipients of such letters at this time. Once such situation is close to requiring another lawsuit. In this regard, Rooterman also considers this very lawsuit its effort to enforce its trademarks. As Exhibit K to the Amended Complaint shows, Rooterman made demands to Belegu starting September 16, 2024 that Belegu cease and desist using trademarks, and transfer domain names back to Rooterman. His failure to adhere to these demands, despite follow up notices from outside counsel November 13, and November 22, 2024, has necessitated this lawsuit. In short, far from abandoning its trademarks, Rooterman vigorously enforces them. Moreover, Rooterman communicates routinely with trademark counsel about its trademark applications and the status of its existing marks, and any updates needed.

3. Belegu and/or his corporation, Quality Air Care Corporation, entered into 13 franchise agreements to do business as Rooterman in various counties and zip codes throughout New Jersey, New York, and Pennsylvania. Appendix 1 to each such Franchise Agreements details include the specific counties and/or zip codes of the licensed territories. Attached hereto as **Exhibit B** hereto is a true and accurate copy of each "Appendix 1" page from each of the 13 Franchise Agreements. This is intended to articulate for the court exactly where Plaintiff seeks an Order pertaining to its restrictive covenants.
4. Rooterman's marks are not only for plumbing and drains, but a corollary to that business to that is for franchisees to offer and provide restoration services. See

[www.rooterman.com/services/restoration](http://www.rooterman.com/services/restoration) Franchisees are encouraged to build their businesses by doing that. As such, as the Rooterman website duly shows, restoration services are part of the Rooterman brand offerings as well. This made “RM Water Damage Restoration” an improper competing corporation from the start, and that same scenario with that company exists now, even if “RM” has been removed from the name. In like kind, the same situation exists with 911 Sewer & Drain.

5. Notably, there is a Google review on the “911 Sewer & Drain” listing, posted by Shenelle LaPierre, that states her insurance company dispatched “Rooter man Plumbing and Restoration” to service her home after her hot water heater failed and flooded her house. Attached hereto as **Exhibit C** is a true and accurate copy of this google review. There are countless other reviews of that company that reference Rooterman. For example, there is another Google review on the “911 Sewer & Drain” listing, posted by William Wild. There is a “Response from the owner” that states “Thank you for taking time to review Rooter Man of NJ, William!” Attached hereto as **Exhibit D** is a true and accurate copy of this google review. There are also numerous other responses from 911 Sewer & Drain responding as “Rooter Man of NJ.” Clearly, Belegu is using this entity in violation of his franchise obligations, and also to create confusion in the market.
6. In fact, the 911 Sewer & Drain Facebook page has numerous postings, starting from February 22, **2021** to May 3, 2023, which holds the company out to be “Rooter Man of NJ” and provide direct links to [www.rootermanplumberservices.com](http://www.rootermanplumberservices.com).

7. To this day, Belegu has not turned over any of his Google business profiles, numerous of which reference Rooterman and belong to the brand, nor his phone number or any of his offending domains.
8. Even today, as of the date of this affidavit, when rootermanplumberservices.com is typed into the address bar on the internet, the URL redirects to the website for 911 Sewer & Drain, 911sewerdrain.com. Attached hereto as **Exhibit E** is a true and accurate copy of screen shots which show this redirection.
9. Moreover, as of this day, Belegu has not returned his franchise Operations Manual, the Rooterman Marketing Essentials Playbook, list of vendor contacts, Home Show presentation materials, phone scripts, all provided to him in 2022 and duly noted to be confidential. The return of all of this is required by his franchise agreements, Sections 18.2

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 17<sup>th</sup> DAY OF JANUARY, 2025



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Nathan King

# EXHIBIT A

**Jenny J. Liu's Law Office**

*Attorney & Counsellor at Law*

*www.Jennyliulaw.com*

P.O. Box 290  
North Billerica, MA 01862

Tele: (978) 670-0718  
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lj@jennyliulaw.com

Date: March 20, 2023

By Email and Priority Mail  
[qacpic@gmail.com](mailto:qacpic@gmail.com)

Klodian Belegu  
Quality Air Care Corporation  
692 Sussex Ct.  
Toms River, NJ 08753

RE: Unauthorized Rooter Man listings

Dear Mr. Belegu,

This is to follow up to our telephone conversation on March 15, 2023. Based on our phone conversation, my understanding was that: (i) currently there were certain Google Rooter Man advertisements or listings in your licensed territory believed to be a former Rooter Man franchisee named Chris Bailey, which caused damages to your business; (ii) you reported to A Corp certain unauthorized internet Rooter Man ads and listing in 2020 and/or 2021; (iii) subsequently you also provided a list of many unauthorized Rooter Man internet ads and/or listings to A Corp. You wanted to follow up what A Corp. did in response to your reports and share with you the information which may help your counsel in your lawsuit against the infringers.

As you requested, I forwarded our conversation to Mr. Donald MacDonald and had a chance to confer with Mr. MacDonald and Ms. Charlene MacDonald. After search and review of my files and the files in the possession of A Corp., it appears that A Corp. took the following actions in response to your above said reports:

1. In June of 2020 and during the transaction for you to buy the Rooter Man territory from another Rooter Man franchise named Arbina Asani, A Corp. discovered that there were some unauthorized Rooter Man ads and/or listings by a former Rooter Man franchisee. On June 11, 2020, on behalf of A Corp., I sent said former franchisee a cease and desist letter and demanded him to stop the unauthorized ads and listings.
2. In August of 2020, on behalf of A Corp., I had multiple email correspondence with Chris Bailey and demanded him to de-identify himself as a Rooter Man business. Mr. Bailey indicated that he would comply with A Corp.'s demand.
3. On June 8, 2021, after we received your report of the unauthorized use of the Rooter Man mark by a former employee of your Rooter Man franchise, on behalf of A Corp. I sent said former employee a cease and desist letter.

4. On June 11, 2021, after we received your report of the unauthorized use of the Sewer Man mark by an infringer, on behalf of A Corp. I sent said infringer a cease and desist letter.
5. With respect to your report of a list of unauthorized Google Rooter Man ads and listings, said list was received by A Corp. in July of 2022. Charlene and Crystal spent a lot of time to contact each phone number on the list to verify the status of the ads and listings. In January of 2022, the Rooter Man franchise was sold, and all the then current franchise agreements were forwarded to the new franchisor, the Rooterman LLC and Premium Services Brand (collectively the "PSB"). As such, after Crystal and Charlene verified the status of above said ads and listing, they forwarded this matter to PSB.
6. Mr. MacDonald contacted PSB about your recent complaint of unauthorized Rooter Man ads and listings.

Your Rooter Man franchise agreement, Section 8.5 (B) provides the following:

**"B. With A CORP's permission, FRANCHISEE may institute litigation to protect FRANCHISEE's interest in the Trademark. In the event that the FRANCHISEE chooses to bring action, and A CORP, in its sole discretion, grants permission, FRANCHISEE shall be responsible for all costs of litigation and shall have a right to any damages collected for infringing use in FRANCHISEE's Territory."**

Accordingly, with respect to your intent to file a lawsuit against the persons or entities who are not Rooter Man franchises and advertised as Rooter Man in your licensed areas, A Corp. is willing to help you by sharing the documents in its possession in support of your claims. However, A Corp. does not own the Rooter Man trademarks anymore and cannot initiate a trademark infringement action against the infringers. PSB as the current owner of the Rooter Man marks has the right and discretion how to enforce its trademark rights.

Thank you for your attention to this letter and please feel free to contact me if you have any questions.

Very truly yours,

  
Jenny Liu

Cc: Russell Kruse (via email [rkruse@premiumservicebrands.com](mailto:rkruse@premiumservicebrands.com))  
Paul Flick (via email [pflick@premiumservicebrands.com](mailto:pflick@premiumservicebrands.com))

# EXHIBIT B



## APPENDIX 1

The Licensed Territory defined below is granted to **FRANCHISEE** on the condition that **FRANCHISEE** performs the obligations set forth in the Agreement to which this Appendix is attached:

STATE	COUNTY	CITY/TOWN	ZIP CODES	POPULATION
NJ	Ocean	Barnegat	08005	22,448
NJ	Ocean	Barnegat Light	08006	518
NJ	Ocean	Beach Haven	08008	6,975
NJ	Ocean	Manahawkin	08050	24,285
NJ	Ocean	Tuckerton	08087	24,104
NJ	Ocean	West Creek	08092	3,673
NJ	Ocean	Lakewood	08701	92,843
NJ	Ocean	Bayville	08721	20,512
NJ	Ocean	Beachwood	08722	11,045
NJ	Ocean	Brick	08723	31,641
NJ	Ocean	Brick	08724	42,352
NJ	Ocean	Forked River	08731	20,009
NJ	Ocean	Island Heights	08732	1,484
NJ	Ocean	Lakehurst	08733	2,752
NJ	Ocean	Lanoka Harbor	08734	7,651
NJ	Ocean	Lavallette	08735	3,114
NJ	Ocean	Mantoloking	08738	1,042
NJ	Ocean	Normandy Beach	08739	0
NJ	Ocean	Ocean Gate	08740	2,010
NJ	Ocean	Pine Beach	08741	2,488
NJ	Ocean	Point Pleasant Beach	08742	24,405
NJ	Ocean	Seaside Heights	08751	4,212
NJ	Ocean	Seaside Park	08752	2,074
NJ	Ocean	Toms River	08753	63,678
NJ	Ocean	Toms River	08754	0
NJ	Ocean	Toms River	08755	25,302
NJ	Ocean	Toms River	08756	0
NJ	Ocean	Toms River	08757	33,217
NJ	Ocean	Waretown	08758	7,043
NJ	Ocean	Manchestser Township	08759	33,263

Total Unit(s)<sup>1</sup> Population: 514,140

Initials: 

**A CORP**

Date: 09/12/19

Initials: RD

**FRANCHISEE**

Date: 9-5-19

<sup>1</sup> One unit is equal to 125,000 populations.

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STATE	COUNTY	CITY/TOWN	ZIP CODES	POPULATION
NJ	Atlantic	All	All	269,918
NJ	Burlington	All	All	448,596
NJ	Camden	All	All	510,719
NJ	Cape May	All	All	93,553
NJ	Cumberland	All	All	152,538
NJ	Gloucester	All	All	292,206
NJ	Hunterdon	All	All	125,059
NJ	Mercer	All	All	374,733
NJ	Salem	All	All	62,792
NJ	Sussex	All	All	141,682
NJ	Union	All	All	563,892
NJ	Warren	All	All	106,798
NJ	Essex	Maplewood	07040	23,876
NJ	Essex	Millburn	07041	6,868
NJ	Essex	Short Hills	07078	13,250
NJ	Essex	South Orange	07079	16,316
NJ	Essex	Newark	07101	0
NJ	Essex	Newark	07102	12,579
NJ	Essex	Newark	07103	32,698
NJ	Essex	Newark	07104	50,478
NJ	Essex	Newark	07105	46,983
NJ	Essex	Newark	07106	31,298
NJ	Essex	Newark	07107	37,650
NJ	Essex	Newark	07108	24,386
NJ	Essex	Newark	07111	53,942
NJ	Essex	Newark	07112	26,417
NJ	Essex	Newark	07114	14,748
NJ	Essex	Newark	07175	0
NJ	Essex	Newark	07184	0
NJ	Essex	Newark	07188	0
NJ	Essex	Newark	07189	0
NJ	Essex	Newark	07192	0
NJ	Essex	Newark	07193	0
NJ	Essex	Newark	07195	0
NJ	Essex	Newark	07198	0
NJ	Essex	Newark	07199	0
NJ	Monmouth	Adelphia	07710	0
NJ	Monmouth	Atlantic Highlands	07716	8,574
NJ	Monmouth	Belford	07718	6,263
NJ	Monmouth	Cliffwood	07721	2,974
NJ	Monmouth	Hazlet	07730	17,396
NJ	Monmouth	Highlands	07732	5,189
NJ	Monmouth	Holmdel	07733	16,849
NJ	Monmouth	Keansburg	07734	13,269


NJ	Monmouth	Keyport	07735	19,569
NJ	Monmouth	Leonardo	07737	4,264
NJ	Monmouth	Marlboro	07746	18,666
NJ	Monmouth	Matawan	07747	30,770
NJ	Monmouth	Middletown	07748	28,030
NJ	Monmouth	Morganville	07751	19,736
NJ	Monmouth	Navesink	07752	0
NJ	Monmouth	Port Monmouth	07758	4,967
NJ	Monmouth	Rumson	07760	9,283
NJ	Monmouth	Tennent	07763	0
NJ	Monmouth	Wickatunk	07765	0
NJ	Monmouth	Eatontown	07799	0

Total Unit(s)<sup>1</sup> Population: 4,208,504

Initials: 

A CORP

Date: 6-9-2020

Initials: 

FRANCHISEE

Date: 6-2-2020

Initials: \_\_\_\_\_

FRANCHISEE

Date: \_\_\_\_\_

<sup>1</sup> One unit is equal to 125,000 populations.

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STATE	COUNTY	CITY/TOWN	ZIP CODES	POPULATION
NJ	Morris	All	All	499,693
NJ	Passaic	All	All	71,247

Total Unit(s)<sup>1</sup> Population: 570,940

Initials:

A CORP

Date:

08-21-2020

Initials:

KRS  
**FRANCHISEE**

Date:

8-11-2020

Initials:

**FRANCHISEE**

Date:

<sup>1</sup> One unit is equal to 125,000 populations.

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STATE	COUNTY	CITY/TOWN	ZIP CODES	POPULATION
NJ	Monmouth	Red Bank	07701	23,813
NJ	Monmouth	Shrewsbury	07702	3,809
NJ	Monmouth	Fort Monmouth	07703	690
NJ	Monmouth	Fair Haven	07704	6,133
NJ	Monmouth	Allenhurst	07711	1,533
NJ	Monmouth	Asbury Park	07712	39,158
NJ	Monmouth	Deal	07723	1,020
NJ	Monmouth	Eatontown	07724	21,710
NJ	Monmouth	Englishtown	07726	42,508
NJ	Monmouth	Freehold	07728	56,527
NJ	Monmouth	Lincroft	07738	6,095
NJ	Monmouth	Little Silver	07739	5,938
NJ	Monmouth	Long Branch	07740	31,038
NJ	Monmouth	Monmouth Beach	07750	3,279
NJ	Monmouth	Oakhurst	07755	6,363
NJ	Monmouth	Oceanport	07757	5,356
NJ	Monmouth	West Long Branch	07764	8,097
NJ	Monmouth	Belmar	07715	0
NJ	Monmouth	Avon By the Sea	07717	1,901
NJ	Monmouth	Belmar	07719	21,538
NJ	Monmouth	Bradley Beach	07720	4,298
NJ	Monmouth	Colts Neck	07722	10,209
NJ	Monmouth	Farmingdale	07727	7,050
NJ	Monmouth	Howell	07731	38,304
NJ	Monmouth	Neptune	07753	37,554
NJ	Monmouth	Neptune	07754	0
NJ	Monmouth	Ocean Grove	07756	3,342
NJ	Monmouth	Spring Lake	07762	8,403
NJ	Monmouth	Allentown	08501	6,582
NJ	Monmouth	Millstone Township	08510	5,231
NJ	Monmouth	Cream Ridge	08514	4,477
NJ	Monmouth	Imlaystown	08526	0
NJ	Monmouth	Millstone Township	08535	5,385
NJ	Monmouth	Roosevelt	08555	877
NJ	Monmouth	Allenwood	08720	843
NJ	Monmouth	Brielle	08730	4,774
NJ	Monmouth	Manasquan	08736	12,578
NJ	Monmouth	Sea Grit	08750	3,528
NJ	Ocean	Jackson	08527	54,392
NJ	Ocean	New Egypt	08533	6,945

Total Unit(s)<sup>1</sup> Population: 501,008

Initials:   
**A CORP**

Date: 01/12/21

Initials: KB  
**FRANCHISEE**

Date: 01/11/2021

Initials: \_\_\_\_\_  
**FRANCHISEE**

Date: \_\_\_\_\_

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<sup>1</sup> One unit is equal to 125,000 populations.

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STATE <sup>*</sup>	COUNTY	CITY/TOWN	ZIP CODES	POPULATION
NJ	Hudson	Bayonne	07002	63,031
NJ	Hudson	Hoboken	07030	50,005
NJ	Hudson	Weehawken	07086	12,554
NJ	Hudson	Union City	07087	66,515
NJ	Hudson	West New York	07093	60,884
NJ	Hudson	Jersey City	07097	0
NJ	Hudson	Jersey City	07302	36,352
NJ	Hudson	Jersey City	07303	0
NJ	Hudson	Jersey City	07304	41,233
NJ	Hudson	Jersey City	07305	60,104
NJ	Hudson	Jersey City	07306	52,669
NJ	Hudson	Jersey City	07307	43,812
NJ	Hudson	Jersey City	07308	0
NJ	Hudson	Jersey City	07310	12,838
NJ	Hudson	Jersey City	07311	522
NJ	Hudson	Jersey City	07395	0
NJ	Hudson	Jersey City	07399	0

Total Unit(s)<sup>1</sup> Population: 500,519

Initials:

DA  
A CORP

Initials:

KB  
FRANCHISEE

Date:

11-18-19

Date:

11-13-19

<sup>1</sup> One unit is equal to 125,000 populations.

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STATE	COUNTY	CITY/TOWN	ZIP CODES	POPULATION
NJ	Somerset	All	All	288,967
NJ	Middlesex	Dunellen	08812	14,296
NJ	Middlesex	Kendall Park	08824	12,115
NJ	Middlesex	Middlesex	08846	13,635
NJ	Middlesex	Monmouth Junction	08852	17,220
NJ	Middlesex	Piscataway	08854	55,961
NJ	Middlesex	Piscataway	08855	0
NJ	Middlesex	New Brunswick	08901	55,223
NJ	Middlesex	North Brunswick	08902	41,153
NJ	Middlesex	New Brunswick	08903	0
NJ	Middlesex	Highland Park	08904	13,982
NJ	Middlesex	New Brunswick	08906	0
NJ	Middlesex	New Brunswick	08933	0
NJ	Middlesex	New Brunswick	08989	0

Total Unit(s)<sup>1</sup> Population: 512,552

Initials:   
A CORP

Date: 11-18-19

Initials:   
FRANCHISEE

Date: 11-13-19

<sup>1</sup> One unit is equal to 125,000 populations.



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STATE	COUNTY	CITY/TOWN	ZIP CODES	POPULATION
NJ	Hudson	Harrison	07029	16,026
NJ	Hudson	Kearny	07032	40,684
NJ	Hudson	North Bergen	07047	60,773
NJ	Hudson	Secaucus	07094	16,264
NJ	Hudson	Secaucus	07096	0
NJ	Hudson	Kearny	07099	0
NJ	Essex	Fairfield	07004	7,440
NJ	Essex	Caldwell	07006	24,812
NJ	Essex	Caldwell	07007	0
NJ	Essex	Cedar Grove	07009	12,411
NJ	Essex	East Orange	07017	35,945
NJ	Essex	East Orange	07018	28,322
NJ	Essex	East Orange	07019	0
NJ	Essex	Essex Fells	07021	2,091
NJ	Essex	Glen Ridge	07028	7,618
NJ	Essex	Livingston	07039	29,358
NJ	Essex	Montclair	07042	25,599
NJ	Essex	Montclair	07043	12,138
NJ	Essex	Verona	07044	13,584
NJ	Essex	Orange	07050	30,074
NJ	Essex	Orange	07051	0
NJ	Essex	West Orange	07052	46,182
NJ	Essex	Roseland	07068	5,819
NJ	Essex	Bloomfield	07003	47,312
NJ	Essex	Belleville	07109	35,897
NJ	Essex	Nutley	07110	28,351

Total Unit(s)<sup>1</sup> Population: 526,700

Initials:

A CORP

Date:

01-08-21

Initials:

KB  
**FRANCHISEE**

Date:

12-30-2020

<sup>1</sup> One unit is equal to 125,000 populations.

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STATE	COUNTY	CITY/TOWN	ZIP CODES	POPULATION
NJ	Middlesex	Avenel	07001	16,305
NJ	Middlesex	Carteret	07008	22,844
NJ	Middlesex	Port Reading	07064	3,723
NJ	Middlesex	Colonia	07067	18,036
NJ	Middlesex	Sewaren	07077	2,766
NJ	Middlesex	South Plainfield	07080	23,377
NJ	Middlesex	Woodbridge	07095	19,844
NJ	Middlesex	Cranbury	08512	10,105
NJ	Middlesex	Plainsboro	08536	20,073
NJ	Middlesex	Dayton	08810	8,401
NJ	Middlesex	East Brunswick	08816	46,298
NJ	Middlesex	Edison	08817	44,621
NJ	Middlesex	Edison	08818	0
NJ	Middlesex	Edison	08820	39,590
NJ	Middlesex	Helmetta	08828	2,178
NJ	Middlesex	Iselin	08830	18,459
NJ	Middlesex	Monroe Township	08831	45,620
NJ	Middlesex	Keasbey	08832	2,863
NJ	Middlesex	Edison	08837	15,847
NJ	Middlesex	Metuchen	08840	16,558
NJ	Middlesex	Milltown	08850	8,281
NJ	Middlesex	Old Bridge	08857	39,898
NJ	Middlesex	Parlin	08859	21,526
NJ	Middlesex	Perth Amboy	08861	53,099
NJ	Middlesex	Perth Amboy	08862	0
NJ	Middlesex	Fords	08863	12,320
NJ	Middlesex	Sayreville	08871	0
NJ	Middlesex	Sayreville	08872	18,811
NJ	Middlesex	South Amboy	08879	23,537
NJ	Middlesex	South River	08882	16,008
NJ	Middlesex	Spotswood	08884	8,257
NJ	Middlesex	Edison	08899	0

Total Unit(s)<sup>1</sup> Population: 579,245

Initials: 

A CORP

Initials: 

FRANCHISEE

Date: 01-08-21

Date: 12-30-2020

<sup>1</sup> One unit is equal to 125,000 populations.

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<u>STATE</u>	<u>COUNTY</u>	<u>CITY/TOWN</u>	<u>ZIP CODES</u>	<u>POPULATION</u>
NJ	Bergen	All	All	925,328

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Total Unit(s)<sup>1</sup> Population: 925,328

Initials:

  
A CORP

Date:

6-9-2020

Initials:

  
FRANCHISEE

Date:

02-14-2020

Initials:

  
FRANCHISEE

Date:

2-11-2020


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<sup>1</sup> One unit is equal to 125,000 populations.

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STATE	COUNTY	CITY/TOWN	ZIP CODES	POPULATION
NY	Rockland	Palisades	10964	1,472
NY	Rockland	Tappan	10983	5,532
NY	Rockland	Orangeburg	10962	5,950
NY	Rockland	Pearl River	10965	14,791
NY	Rockland	Blauvelt	10913	5,532
NY	Rockland	Nyack	10960	15,093
NY	Rockland	Palisades	10994	1,472
NY	Rockland	Bardonia	10954	23,045
NY	Rockland	Spring Valley	10977	59,048
NY	Rockland	New City	10956	31,521
NY	Rockland	Valley Cottage	10989	9,293
NY	Rockland	Congers	10920	8,554
NY	Rockland	Haverstraw	10927	11,910
NY	Rockland	Garnerville	10923	8,732
NY	Rockland	West Haverstraw	10993	4,769
NY	Rockland	Stony Point	10980	13,383
NY	Rockland	Tomkins Cove	10986	1,974
NY	Rockland	Thiells	10984	2,842
NY	Rockland	Pomona	10970	9,993
NY	Rockland	Sparkill	10976	2,258
NY	Rockland	Piermont	10968	2,353
NY	Rockland	Monsey	10952	38,917

Total Unit(s)<sup>1</sup> Population: 278,434

Initials: 

**A CORP**

Date: 01-08-21

Initials: 

**FRANCHISEE**

Date: 12-30-2020

<sup>1</sup> One unit is equal to 125,000 populations.

**EXHIBIT A**

**GUARANTY OF PERFORMANCE**

The undersigned, who each own 5% or more of **FRANCHISEE**, jointly and severally guaranty the performance of **FRANCHISEE** pursuant to this Franchise Agreement.

By:

K Belegu  
Klodian Belegu

Date:

12-30-2020

By: \_\_\_\_\_

Date: \_\_\_\_\_

To Be Executed By Principal Stockholder(s) If Franchisee Is a Corporation.

The undersigned, principal stockholder(s) of the above Franchisee, for value received, hereby absolutely and unconditionally guarantee(s) full performance and payment when due of all of Franchisee's obligations to A CORP pursuant to the above Agreement.

**XX, FRANCHISEE**

By: \_\_\_\_\_

Date: \_\_\_\_\_

By: \_\_\_\_\_

Date: \_\_\_\_\_

## APPENDIX 1

The Licensed Territory defined below is granted to **FRANCHISEE** on the condition that **FRANCHISEE** performs the obligations set forth in the Agreement to which this Appendix is attached:

STATE	COUNTY	CITY/TOWN	ZIP CODES	POPULATION
NY	West Chester	Amawalk	10501	1,219
NY	West Chester	Armonk	10504	7,987
NY	West Chester	Baldwin Place	10505	851
NY	West Chester	Bedford	10506	5,790
NY	West Chester	Bedford Hills	10507	6,408
NY	West Chester	Briarcliff Manor	10510	9,988
NY	West Chester	Buchanan	10511	2,246
NY	West Chester	Chappaqua	10514	11,946
NY	West Chester	Crompond	10517	539
NY	West Chester	Cross River	10518	1,268
NY	West Chester	Croton Falls	10519	316
NY	West Chester	Croton on Hudson	10520	12,810
NY	West Chester	Croton on Hudson	10521	0
NY	West Chester	Golden Bridge	10526	1,809
NY	West Chester	Granite Springs	10527	908
NY	West Chester	Hawthorne	10532	4,931
NY	West Chester	Jefferson Valley	10535	555
NY	West Chester	Katonah	10536	10,739
NY	West Chester	Lincondale	10540	0
NY	West Chester	Maryknoll	10545	141
NY	West Chester	Millwood	10546	1,277
NY	West Chester	Mohegan Lake	10547	7,647
NY	West Chester	Montrose	10548	3,487
NY	West Chester	Mount Kisco	10549	16,638
NY	West Chester	North Salem	10560	4,737
NY	West Chester	Ossining	10562	31,796
NY	West Chester	Peekskill	10566	23,570
NY	West Chester	Cortlandt Manor	10567	19,929
NY	West Chester	Pleasantville	10570	12,680
NY	West Chester	Pound Ridge	10576	5,116
NY	West Chester	Purdy's	10578	681
NY	West Chester	Shenorock	10587	0
NY	West Chester	Shrub Oak	10588	2,282
NY	West Chester	Somers	10589	8,475
NY	West Chester	South Salem	10590	6,767
NY	West Chester	Tarrytown	10591	22,540
NY	West Chester	Thornwood	10594	5,117
NY	West Chester	Valhalla	10595	8,195
NY	West Chester	Verplanck	10596	1,729
NY	West Chester	Waccabuc	10597	968
NY	West Chester	Yorktown Heights	10598	28,647

Total Unit(s)<sup>1</sup> Population: 292,729

Initials:   
A CORP

Date: 11-18-19

Initials:   
FRANCHISEE

Date: 9-29-19

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<sup>1</sup> One unit is equal to 125,000 populations.

**APPENDIX 1**

The Licensed Territory defined below is granted to **FRANCHISEE** on the condition that **FRANCHISEE** performs the obligations set forth in the Agreement to which this Appendix is attached:

STATE	COUNTY	CITY/TOWN	ZIP CODES	POPULATION
NY	Richmond	All	All	468,730

Total Unit(s)<sup>1</sup> Population: 468,730

Initials:   
A CORP

Date: 6-9-2020

Initials:   
FRANCHISEE

Date: 6-7-2020

Initials: \_\_\_\_\_  
FRANCHISEE

Date: \_\_\_\_\_

<sup>1</sup> One unit is equal to 125,000 populations.



## APPENDIX 1

The Licensed Territory defined below is granted to **FRANCHISEE** on the condition that **FRANCHISEE** performs the obligations set forth in the Agreement to which this Appendix is attached:

STATE	COUNTY	CITY/TOWN	ZIP CODES	POPULATION
PA	Bucks	Jamison	18929	9,306
PA	Bucks	Newtown	18940	28,825
PA	Bucks	Richboro	18954	9,745
PA	Bucks	Southampton	18966	37,999
PA	Bucks	Warminster	18974	40,953
PA	Bucks	Warrington	18976	19,795
PA	Bucks	Washington Crossing	18977	4,291
PA	Bucks	Wycombe	18980	510
PA	Bucks	Bristol	19007	21,125
PA	Bucks	Bensalem	19020	55,493
PA	Bucks	Croydon	19021	10,074
PA	Bucks	Fairless Hills	19030	12,122
PA	Bucks	Lanhome	19047	35,056
PA	Bucks	Fort Washington	19048	0
PA	Bucks	Fort Washington	19049	0
PA	Bucks	Feasterville Trevose	19053	25,966
PA	Bucks	Levittown	19054	17,437
PA	Bucks	Levittown	19055	13,924
PA	Bucks	Levittown	19056	15,486
PA	Bucks	Levittown	19057	17,191
PA	Bucks	Levittown	19058	0
PA	Bucks	Morrisville	19067	51,334
PA	Montgomery	Abington	19001	17,020
PA	Montgomery	Huntington Valley	19006	21,423
PA	Montgomery	Cheltenham	19012	6,670
PA	Montgomery	Dresher	19025	5,395
PA	Montgomery	Elkins Park	19027	19,067
PA	Montgomery	Flourtown	19031	4,700
PA	Montgomery	Fort Washington	19034	5,999
PA	Montgomery	Glenside	19038	31,595
PA	Montgomery	Hatboro	19040	20,536
PA	Montgomery	Horsham	19044	15,853
PA	Montgomery	Jenkintown	19046	17,809
PA	Montgomery	Oreland	19075	7,354
PA	Montgomery	Will Grove	19090	18,832
PA	Montgomery	Wyncote	19095	7,063

Total Unit(s)<sup>1</sup> Population: 625,948

<sup>1</sup> One unit is equal to 125,000 populations.

Initials:   
A CORP

Date: 6-9-2020

Initials:   
FRANCHISEE

Date: 6-2-2020

Initials: \_\_\_\_\_  
FRANCHISEE

Date: \_\_\_\_\_

# EXHIBIT C



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Recents

## 911 Sewer & Drain

Plumber  
Toms River

[PLACE DETAILS](#)

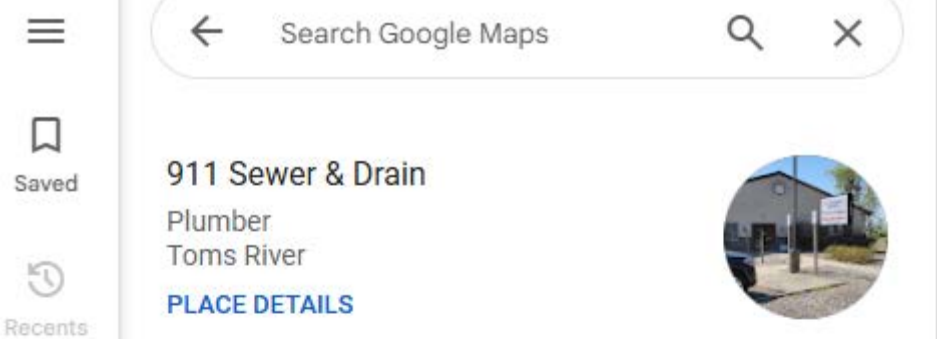
Shenelle LaPierre



★ ★ ★ ★ ★ 2 months ago

Zero stars. Do not work with this company, they are scammers, will tell you one thing and do the opposite. April 2024 my hot water heater failed and Cinch (Home warranty) dispatched Rooter man Plumbing and Restoration to service my home. The plumber was supposed to assess the HW heater and restoration team for the water damage. Plumber deemed the HW heater needed to be replaced, fine. The Restoration people removed my carpet, fine, that was ruined by water damage. They had the audacity to take my rubber gym tiles, ceiling tiles, entry way doors, door hinges, removed my metal pipe for drying venting and anything else they deemed necessary without consulting me. Took my stuff and hauled it away in their vans before I noticed my belongings were gone. Their workers shut off my water because they didn't drain the water heater and assumed insurance would cover me for room and board. The "so called owner" came to my home, insisted the damage was a category 2 when insurance deemed category 1 based on their numbers. Ceiling tiles weren't wet and no one told them to dispose of everything other than the carpet. Then audaciously invoiced my insurance company for over \$70k of work which was never quoted prior to doing the work. Now there is white residue everywhere in my basement from whatever "solution" they used meanwhile Donovan claimed Dawn dish soap was their cleaning agent against mold

# EXHIBIT D



William Wild



★★★★★ a year ago

They arrived quickly and explained the process completely. They offered a few possible solutions to help solve the issue. They were friendly and worked quickly and solved the issue. I would call them again if I had another problem.



Like



Share

**Response from the owner** a year ago

Thank you for taking time to review Rooter Man of NJ, William! We're thrilled to hear you had a wonderful experience and that your problem was solved quickly. It's great to know we provided helpful information on potential solutions as well - our team is always here if you have any other plumbing emergencies in the future. Your feedback is invaluable and I'm just glad it was all positive this time around! Thanks again for choosing us!

# EXHIBIT E



rootermanplumberservices.com

Google



Search Google or type a URL







911 SEWER & DRAIN



24/7 Local Plumbing Services

# 911 Sewer & Drain

## Emergency Plumbing & Drain Cleaning

Whether it's a clogged drain, burst pipe, or a sewage backup, we're at your service to restore order and comfort to your home or business.

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